## Section I: General Measures to Deter Bribery

Question 4:

| Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank? | | If yes: a) Which actors associated with the transaction are subject to verification? | | | Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications: |
|---|---|---|---|---|---|
| Australia | Yes, always | the applicant | X | at the time of application | In cases where an application form has not been submitted for a particular transaction, EFIC ensures that this Declaration is obtained by requiring the exporter, and where appropriate applicants, to provide a written statement as a condition to acceptance of EFIC's Letter of Offer. |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Austria | Yes, always | the applicant | X | at the time of application | In case of a buyer's credit the exporter has to submit a stand-alone declaration additionally. |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Belgium | Yes, always | the applicant | X | both at the time of application and before support is provided | Staff check the list of the World Bank |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | X | both at the time of application and before support is provided | |
| Canada | Yes, always | the applicant | X | both at the time of application and before support is provided | "other" means any counterparty to the transaction in question.<br><br>Depending on the product in question, the exporter/applicant self-declaration is either in the application form and verification is achieved at the time of the application, or it is received before support is provided through a stand-alone declaration. |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | X | both at the time of application and before support is provided | |
| Czech Republic (EGAP) | Yes, always | the applicant | X | both at the time of application and before support is provided | Intermediaries |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | X | both at the time of application and before support is provided | |
| Czech Republic (CEB) | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |



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|---|---|---|---|---|---|
| Denmark | Yes, always | the applicant | X | before support is provided | |
| | | the exporter(s) | X | before support is provided | |
| | | other | | | |
| Finland | Yes, always | the applicant | X | before support is provided | Agents might be checked if there is a reason to conduct the enhanced due diligence. |
| | | the exporter(s) | X | before support is provided | |
| | | other | X | (not specified) | |
| France | Yes, always | the applicant | X | both at the time of application and before support is provided | Pour les opérations financées par crédit acheteur, l'inscription de la banque prêteuse sur les listes d'exclusion est également vérifiée. |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | | | |
| Germany | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Greece | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Hungary (MEHIB) | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Hungary (Eximbank) | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Italy | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |

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|---|---|---|---|---|---|
| Japan (JBIC) | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Japan (NEXI) | Yes, always | the applicant | X | before support is provided | |
| | | the exporter(s) | X | before support is provided | |
| | | other | | | |
| Korea (Eximbank) | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Korea (K-sure) | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Luxembourg | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Mexico | Yes, sometimes | the applicant | | | Another banks in the case of second floor credits |
| | | the exporter(s) | X | | |
| | | other | X | | |
| Netherlands | Yes, always | the applicant | | | Atradius DSB always ask exporters in the application form the amount of commission being paid, the name and address of the agent to whom commission is being paid and the work done for the commission paid. Normally 5% of the contract amount or EUR 4.500.000 (whichever is the lowest) is the limit, even if explanation is provided. |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | X | both at the time of application and before support is provided | |



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|---|---|---|---|---|---|
| New Zealand | Yes, always | the applicant | X | both at the time of application and before support is provided | In practice the disclosures and self-declarations are asked to be submitted at the time of application, and any follow up work by NZECO staff (such as checking debarment lists) is undertaken after that, but before any support is provided. |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | | | |
| Norway | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | | | |
| Poland | Yes, always | the applicant | X | both at the time of application and before support is provided | |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | | | |
| Portugal | Yes, always | the applicant | X | both at the time of application and before support is provided | Identification of the agents to ascertain their credibility is sought, if necessary. |
| | | the exporter(s) | X | both at the time of application and before support is provided | |
| | | other | X | before support is provided | |
| Slovak Republic | Yes, always | the applicant | X | at the time of application | Subject to verification is an exporter, where appropriate an applicant. |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Spain | Yes, always | the applicant | X | before support is provided | |
| | | the exporter(s) | X | before support is provided | |
| | | other | | | |

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|---|---|---|---|---|---|
| Sweden | Yes, always | the applicant | X | at the time of application | |
| | | the exporter(s) | X | at the time of application | |
| | | other | | | |
| Switzerland | Yes, always | the applicant | X | at the time of application | For SERV, "other" in this question means "agents". As a rule, SERV requires the verification at the time of application. However, should the applicant have questions, (some have found it difficult to find the debarment lists), SERV would continue to process the transaction but would not provide any support until the undertaking / declaration has been submitted. |
| | | the exporter(s) | X | at the time of application | |
| | | other | X | at the time of application | |
| Turkey | Yes, always | the applicant | | | |
| | | the exporter(s) | X | before support is provided | |
| | | other | | | |
| United Kingdom | Yes, always | the applicant | X | at the time of application | All named agents. For all exporters, companies acting as the main insured under ECA Reinsurance cases, buyers, borrowers and guarantors and for any agent or other intermediary, joint venture partner and consortium member. |
| | | the exporter(s) | X | at the time of application | |
| | | other | X | at the time of application | |
| United States (EXIM) | Yes, always | the applicant | X | before support is provided | Other transaction participants, including borrowers, guarantors and agents, are checked against the United States Government debarment lists as appropriate. |
| | | the exporter(s) | X | before support is provided | |
| | | other | X | before support is provided | |





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Question 4:

| Do you verify and note whether exporters, and where appropriate, applicants, are listed on the publicly available debarment lists of the following international financial institutions (IFIs): World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development and the Inter-American Development Bank? | | If yes: a) Which actors associated with the transaction are subject to verification? | | | Elaboration for "other (*e.g.* agents)" answers and/or any additional comments/clarifications: |
|---|---|---|---|---|---|
| United States (USDA) | No | the applicant | X | both at the time of application and before support is provided | The applicant is the exporter in the case of the GSM programs. All participants in the guarantee transaction i.e. exporters, importers, banks are subject to daily system verification.<br><br>We conduct ongoing checks (nightly in our system) against debarment lists for parties excluded from doing business under U.S. government programs or from exporting from the the U.S. However, the system does not currently check against the bank lists specifically mentioned in the question. We are reviewing this to see how we can incorporate these additional checks in our system. We have provided links to the IFI's websites (see the text under Question 2 b)). |
| | | the exporter(s) | | | |
| | | other | | | |

## Section I: General Measures to Deter Bribery

Question 4 (continued):

| b) Please indicate how the verification is achieved: | | | | Elaboration for "other" answers and/or any additional comments/clarifications: |
|---|---|---|---|---|
| Australia | staff check the lists | X | before support is provided | In cases where an application form has not been submitted for a particular transaction, EFIC ensures that this Declaration is obtained by requiring the exporter, and where appropriate applicants, to provide a written statement as a condition to acceptance of EFIC's Letter of Offer. Aside from the Declaration in the credit application form, verification is also obtained as part of our due diligence. Publicly available debarment lists (currently only the World Bank listing) are checked as part of the due diligence (pre-approval phase) conducted on a proposed transaction. |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Austria | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Belgium | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Canada | staff check the lists | X | before support is provided | "other" means any counterparty to the transaction in question.<br><br>Depending on the product in question, the exporter/applicant self-declaration is either in the application form and verification is achieved at the time of the application, or it is received before support is provided through a stand-alone declaration.<br><br>At EDC, the lists are reviewed on a monthly basis and debarred counterparties are entered into our transaction processing system. At any time a transaction is entered into the system with a counterparty that has been debarred, a flag will appear warning the underwriter to undertake enhanced due diligence. |
| | exporter/applicant self-declaration | X | both at the time of application and before support is provided | |
| | other | X | both at the time of application and before support is provided | |
| Czech Republic (EGAP) | staff check the lists | X | both at the time of application and before support is provided | Intermediaries; consult the declaration of the exporter above.<br>Debarment list of the WB is fortnightly compared with all subjects in the documentation system of EGAP. If there would be any subject on the debarment list, all underwriters will be immediately informed on this fact. |
| | exporter/applicant self-declaration | X | both at the time of application and before support is provided | |
| | other | X | both at the time of application and before support is provided | |
| Czech Republic (CEB) | staff check the lists | X | before support is provided | Presently only World Bank Debarment List is used. |
| | exporter/applicant self-declaration | X | before support is provided | |
| | other | | | |





## Section I: General Measures to Deter Bribery

Question 4 (continued):

| b) Please indicate how the verification is achieved: | | | | Elaboration for "other" answers and/or any additional comments/clarifications: |
|---|---|---|---|---|
| Denmark | staff check the lists | | | Self-declaration by way of checkboxes in the declaration of non-bribery.<br><br>EKF is considering whether to include this in the application form. |
| | exporter/applicant self-declaration | X | before support is provided | |
| | other | | | |
| Finland | staff check the lists | X | before support is provided | With regard to the short term guarantees the underwriters check the publicly available debarment lists.<br>With regard to the long term guarantees and interest equalisation the exporter/applicant confirms this matter in the anti-bribery declaration (see question 3 point c) and the text provided point 1 f)).<br>Random checks of the lists are also carried out by the staff. |
| | exporter/applicant self-declaration | X | before support is provided | |
| | other | | | |
| France | staff check the lists | X | both at the time of application and before support is provided | Questions dans la rubrique "lutte contre la corruption" du Formulaire de demande d'assurance crédit:<br>1- Le demandeur figure-t-il sur une liste d'exclusion accessible au public du Groupe de la Banque mondiale, de la Banque africaine de développement, de la Banque asiatique de développement, de la Banque européenne pour la reconstruction et le développement, de la Banque inter-américaine de développement ?<br>☐ oui ☐ non |
| | exporter/applicant self-declaration | X | both at the time of application and before support is provided | |
| | other | | | |
| Germany | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | | | |
| | other | | | |
| Greece | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | | | |
| | other | | | |
| Hungary (MEHIB) | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | | | |
| | other | | | |
| Hungary (Eximbank) | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | | | |
| | | | | |
| Italy | staff check the lists | | | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Japan (JBIC) | staff check the lists | | | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |

## Section I: General Measures to Deter Bribery

Question 4 (continued):

| b) Please indicate how the verification is achieved: | | | | Elaboration for "other" answers and/or any additional comments/clarifications: |
|---|---|---|---|---|
| Japan (NEXI) | staff check the lists | X | before support is provided | |
| | exporter/applicant self-declaration | | | |
| | other | | | |
| Korea (Eximbank) | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Korea (K-sure) | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Luxembourg | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Mexico | staff check the lists | X | | We check only in case of loans that are funded by a multilateral organization |
| | exporter/applicant self-declaration | | | |
| | other | | | |
| Netherlands | staff check the lists | X | both at the time of application and before support is provided | |
| | exporter/applicant self-declaration | X | both at the time of application and before support is provided | |
| | other | | | |
| New Zealand | staff check the lists | X | before support is provided | The applicant is required to provide a declaration that "neither I, nor any persons acting on my behalf, is listed on the publicly available debarment list of the World Bank Group or of any similar international financial institution" and as part of the due diligence publicly available debarment lists are checked by NZECO staff members. |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Norway | staff check the lists | | | Before guarantee is issued, the exporter will have to sign an exporters statement including a confirmation that the information given in the application is still valid. |
| | exporter/applicant self-declaration | X | both at the time of application and before support is provided | |
| | other | | | |
| Poland | staff check the lists | X | both at the time of application and before support is provided | KUKE S.A. included links to the debarment lists on web site in order to facilitate the self-verification by the exporter/applicant. |
| | exporter/applicant self-declaration | X | both at the time of application and before support is provided | |
| | other | | | |
| Portugal | staff check the lists | X | before support is provided | As a matter of rule the exporter must report the amount of fees and commissions paid. If such amounts are excessive in relation to the usual business standard, COSEC will ask for detailed explanation and if necessary will conduct an enhanced due diligence procedure. |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |



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Question 4 (continued):

| b) Please indicate how the verification is achieved: | | | | Elaboration for "other" answers and/or any additional comments/clarifications: |
|---|---|---|---|---|
| Slovak Republic | staff check the lists | | | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Spain | staff check the lists | X | before support is provided | |
| | exporter/applicant self-declaration | | | |
| | other | | | |
| Sweden | staff check the lists | | | Following information from the OECD Secretariat that only the debarments list of the World Bank Group and EBRD are publicly available for the moment, EKN/SEK verifies and notes whether the exporter/applicant is listed on the debarment list of the two institutions. |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Switzerland | staff check the lists | | | See the text provided under Question 1 b). As a rule, SERV requires the verification at the time of application. However, should the applicant have questions, (some have found it difficult to find the debarment lists), SERV would continue to process the transaction but would not provide any support until the undertaking / declaration has been submitted. |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| Turkey | staff check the lists | | | |
| | exporter/applicant self-declaration | X | before support is provided | |
| | other | | | |
| United Kingdom | staff check the lists | X | at the time of application | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| United States (EXIM) | staff check the lists | X | before support is provided | |
| | exporter/applicant self-declaration | X | at the time of application | |
| | other | | | |
| United States (USDA) | staff check the lists | X | both at the time of application and before support is provided | The GSM database is designed to check automatically the Department of Treasury's Office of Financial Assets & Control (OFAC) List nightly for debarred applicants. This list provides individual names and organizations that have been debarred. In addition, the Department of Commerce's Excluded Party List (EPLS) is also checked nightly by the GSM database. |
| | exporter/applicant self-declaration | | | |
| | other | X | both at the time of application and before support is provided | |

## Section I: Measures to Deter Bribery

Question 4 (continued):

| Please describe any additional measures taken in relation to current or past debarment of exporters/applicants by other institutions: | |
|---|---|
| Australia | |
| Austria | |
| Belgium | |
| Canada | |
| Czech Republic (EGAP) | |
| Czech Republic (CEB) | |
| Denmark | |
| Finland | |
| France | Formulaire de demande d'assurance crédit:<br>Le demandeur s'engage à tenir Coface informée de toute modification des informations figurant dans la demande d'assurance-crédit et ses annexes et de toute modification dans la nature ou l'importance des risques dont la couverture est sollicitée.<br><br>Conditions Générales des Polices (Gestion du risque)<br>L'Assuré s'engage, sous peine de sanctions à informer la Compagnie immédiatement en cas d'apparition de son Etablissement sur une des listes accessibles au public des institutions internationales suivantes : Groupe Banque Mondiale, Banque africaine de développement, Banque asiatique de développement, Banque européenne pour la reconstruction et le développement et Banque inter-américaine de développement ; |
| Germany | |
| Greece | |
| Hungary (MEHIB) | |
| Hungary (Eximbank) | |
| Italy | |
| Japan (JBIC) | |
| Japan (NEXI) | |
| Korea (Eximbank) | |
| Korea (K-sure) | |
| Luxembourg | |
| Mexico | |





## Section I: Measures to Deter Bribery

Question 4 (continued):

| Please describe any additional measures taken in relation to current or past debarment of exporters/applicants by other institutions: | |
|---|---|
| Netherlands | |
| New Zealand | |
| Norway | |
| Poland | |
| Portugal | In general, the Policy holder is obliged to inform COSEC of any modification of the information reported in the application form previously submitted to the Insurer, which has impact in the risk assessment, specially if it involves the status and creditworthiness of any party related to the export credit transaction. |
| Slovak Republic | |
| Spain | |
| Sweden | |
| Switzerland | |
| Turkey | Additionally, Article 6 of Turk Eximbank's "Directives on Combating Bribery of Foreign Public Officials in International Business Transctions" , which is an internal document, reads as:<br><br>Should the companies, as the exporter of goods/services benefiting from support, whether or not they are the direct applicants, declare their noncompliance against the Articles 2 or 3 of the Undertaking at the time of the application, such application may be taken into consideration if;<br><br>d. The bribing employee was dismissed,<br>e. The Company has a well established "management control system",<br>f. The Company agrees to have an independent audit carried out and to deliver these reports as the Bank may require,<br>d. The Company agrees to take other measures as the Bank may require |
| United Kingdom | |
| United States (EXIM) | In addition to references to the lists in the application and exporter's certificate, Ex-Im Bank's website contains links to the debarment lists. |
| United States (USDA) | USDA staff will unqualify (bar participation in the program) exporters in the system if their names appear on the OFAC, EPLS list or any other publicly available debarment list. |